

which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo's business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo's rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the documents described above allow trends to be derived, and gains and losses of competitors derived as well, information that would harm Yieldmo if disclosed to our competitors.

29. PTX1280 Figure 110, Initial Expert Report of Robin S. Lee Summary of worldwide open-web indirect display take rates among ad exchanges. This document includes information regarding Yieldmo's "take rates," which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo's business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo's rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or

otherwise take market share. Portions of the documents described above list rates charged by Yieldmo and analyze them in comparison to rates charged by our competitors, information that would harm Yieldmo if disclosed to our competitors.

30. PTX1292 Figure 122, Initial Expert Report of Robin S. Lee AdX maintains a substantial share of worldwide indirect open-web display impressions transacted through ad exchanges (2018–2022). This document includes information regarding Yieldmo’s market share of impressions, which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo’s business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo’s rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the documents described above allow trends to be derived, and gains and losses of competitors derived as well, information that would harm Yieldmo if disclosed to our competitors.

31. PTX1293 Figure 123, Initial Expert Report of Robin S. Lee AdX maintains a significant share of ad exchange fees from worldwide indirect open-web display transactions (2018–2022). This document includes information regarding Yieldmo’s market share of revenues, which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this

information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo's business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo's rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the documents described above allow trends to be derived, and gains and losses of competitors derived as well, information that would harm Yieldmo if disclosed to our competitors.

32. PTX1294 Figure 124, Initial Expert Report of Robin S. Lee AdX maintains a substantial share of US indirect open-web display impressions transacted through ad exchanges (2018–2022). This document includes information regarding Yieldmo's market share of impressions, which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo's business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo's rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the documents described above allow

trends to be derived, and gains and losses of competitors derived as well, information that would harm Yieldmo if disclosed to our competitors.

33. PTX1295 Figure 125, Initial Expert Report of Robin S. Lee AdX earns consistently high net revenues from the sale of US indirect open-web display impressions (2018–2022). This document includes information regarding Yieldmo’s market share of revenues, which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo’s business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo’s rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the documents described above allow trends to be derived, and gains and losses of competitors derived as well, information that would harm Yieldmo if disclosed to our competitors.

34. PTX1306 Figure 137, Initial Expert Report of Robin S. Lee Monthly coverage of exchanges that produced data (impressions). Yieldmo is unable to determine the substance of the document based on the description provided, and requests that an unredacted version be produced by Plaintiffs for evaluation and objection as necessary.

35. PTX1307 Figure 138, Initial Expert Report of Robin S. Lee Monthly coverage of exchanges that produced data (spend). Yieldmo is unable to determine the substance of the document based on the description provided, and requests that an unredacted version be produced by Plaintiffs for evaluation and objection as necessary.
36. PTX1313 Figure 5, Initial Expert Report of Gabriel Weintraub Monthly Number of Demand Sources that Served at Least One Impression Through AdX and Rival Exchanges.
37. PTX1314 Figure 6, Initial Expert Report of Gabriel Weintraub Monthly Volume of Impressions Won for AdX and Rival Exchanges. This document includes information regarding Yieldmo's impression trends, which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo's business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo's rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the documents described above allow trends to be derived, and gains and losses of competitors derived as well, information that would harm Yieldmo if disclosed to our competitors.
38. PTX1317 Figure 9, Initial Expert Report of Gabriel Weintraub Monthly Advertiser

Spend for AdX and Rival Exchanges. This document includes information regarding Yieldmo's impressions trends, which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo's business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo's rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the documents described above allow trends to be derived, and gains and losses of competitors derived as well, information that would harm Yieldmo if disclosed to our competitors.

39. PTX1318 Figure 10, Initial Expert Report of Gabriel Weintraub Monthly Net Revenue for AdX and Rival Exchanges. This document includes information regarding Yieldmo's revenue trends, which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo's business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo's rates compare to those charged by others in the industry. This information is not available to the public and would be of

significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the documents described above allow trends to be derived, and gains and losses of competitors derived as well, information that would harm Yieldmo if disclosed to our competitors.

40. PTX1396 Figure 29, Rebuttal Expert Report of Robin Lee Dr. Israel's estimate of US ad exchange fees for indirect web nonvideo advertising (2020–2022). This document includes information regarding Yieldmo's take rates, which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo's business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo's rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the documents described above list rates charged by Yieldmo and analyze them in comparison to rates charged by our competitors, information that would harm Yieldmo if disclosed to our competitors.
41. PTX1364 Figure 3, Rebuttal Expert Report of Timothy Simcoe Comparables But-For Take Rate Estimates Excluding One Third Party Exchange, Worldwide, Impressions. This document includes information regarding Yieldmo's take rates, which constitutes highly confidential and competitively sensitive Yieldmo

information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo's business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo's rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the documents described above list rates charged by Yieldmo and analyze them in comparison to rates charged by our competitors, information that would harm Yieldmo if disclosed to our competitors.]

42. PTX1365 Figure 4, Rebuttal Expert Report of Timothy Simcoe Event Study But-For Take Rate Estimates Controlling For Adx And Third-Party Exchange trends, Worldwide Impressions. This document includes information regarding Yieldmo's "take rates," which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo's business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo's rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the

documents described above list rates charged by Yieldmo and analyze them in comparison to rates charged by our competitors, information that would harm Yieldmo if disclosed to our competitors.

Google's Trial Exhibits Regarding Yieldmo

43. Google asserts that it may use the following exhibits at trial that reference Yieldmo, or Yieldmo's commercially sensitive business information, and Google itself has provided the description below of the proposed exhibits. Yieldmo's specific objections to each such document are provided below, and further explained in Mr. Eaton's July 26, 2024 Declaration, attached hereto as Exhibit 1 and incorporated herein by reference.
44. **DTX 1893, DTX 2049, and DTX 2064** show combined revenue shares for various combinations of one buying tool and one exchange. Yieldmo is named as the exchange in several of the combinations. These documents include information regarding Yieldmo's take rates, which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo's business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo's rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the documents described above list rates

charged by Yieldmo and analyze them in comparison to rates charged by our competitors, information that would harm Yieldmo if disclosed to our competitors.

45. **DTX 1956** shows individual amounts of ad spending on Yieldmo and other ad exchanges for 2019 and 2022. This document includes information regarding Yieldmo's ad spend, which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo's business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo's rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the documents described above list rates charged by Yieldmo and analyze them in comparison to rates charged by our competitors, information that would harm Yieldmo if disclosed to our competitors.

46. **DTX 1989** and **DTX 1991** aggregate data from Google and numerous third parties. Market shares calculated from that aggregated data are listed individually for each included company, including Yieldmo. These documents include information regarding Yieldmo's market share, which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The

information also constitutes core financial information for Yieldmo's business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo's rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the documents described above list rates charged by Yieldmo and analyze them in comparison to rates charged by our competitors, information that would harm Yieldmo if disclosed to our competitors.

47. **DTX 1651** and **DTX 1892** show individual revenue shares for Yieldmo and other ad exchanges for 2020, 2021, and 2022. These documents include information regarding Yieldmo's take rates, which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo's business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo's rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the documents described above list rates charged by Yieldmo and analyze them in comparison to rates charged by our competitors, information that would harm Yieldmo if disclosed to our competitors.

48. **DTX 2051** and **DTX 2065** show individual exchanges' (including Yieldmo's) average revenue share, average CPM, and number of impressions between January 2019 and March 2023. These documents include information regarding Yieldmo's take rates, which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo's business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo's rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the documents described above list rates charged by Yieldmo and analyze them in comparison to rates charged by our competitors, information that would harm Yieldmo if disclosed to our competitors.
49. **DTX 2053** and **DTX 2054** show individual revenue shares for Yieldmo and other ad exchanges. Yieldmo's revenue share is shown individually for 2018, 2019, 2020, 2021, 2022, and 2023. These documents include information regarding Yieldmo's take rates, which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo's business. It reveals how Yieldmo charges for

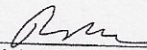
its services and the market penetration and success of its exchange, and shows how Yieldmo's rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the documents described above list rates charged by Yieldmo and analyze them in comparison to rates charged by our competitors, information that would harm Yieldmo if disclosed to our competitors.

50. **DTX 2066** shows individual revenue shares for Yieldmo and other ad exchanges from January 2019 through March 2023. This document includes information regarding Yieldmo's take rates, which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo's business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo's rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the documents described above list rates charged by Yieldmo and analyze them in comparison to rates charged by our competitors, information that would harm Yieldmo if disclosed to our competitors.
51. **DTX 2067** and **DTX 2069** show individual revenue shares for Yieldmo and other ad exchanges from 2016 through 2023. These documents include information

regarding Yieldmo's take rates, which constitutes highly confidential and competitively sensitive Yieldmo information that is not public. Disclosure of this information would likely cause irreparable harm to Yieldmo, including but not limited loss of competitive advantage and financial harm. The information also constitutes core financial information for Yieldmo's business. It reveals how Yieldmo charges for its services and the market penetration and success of its exchange, and shows how Yieldmo's rates compare to those charged by others in the industry. This information is not available to the public and would be of significant benefit to competitors looking for ways to undercut Yieldmo, or otherwise take market share. Portions of the documents described above list rates charged by Yieldmo and analyze them in comparison to rates charged by our competitors, information that would harm Yieldmo if disclosed to our competitors.

I hereby swear and affirm, under penalty of perjury, that the foregoing information is true and correct, to the best of my knowledge, information and belief.

Date: 07/26/24


Richard Eaton